

## **REMARKS**

Claims 1-42 have been cancelled and new claims 63-89 have been added.

The new claims define over the prior art of record, which fails to disclose a system for monitoring and managing a refrigeration system at a remote location, wherein the system includes a management center including an energy-analysis module, a maintenance module, and a data warehouse. The management center receives information from the remote location regarding performance of the refrigeration system, while the maintenance module and the energy-analysis module process the information and the data warehouse stores the information. None of the prior art, including Torimitsu, MacArthur et al., Ishio et al., and Jones teach or suggest such a remote monitoring system. Specifically, the references, alone and in combination, fail to teach a management center, including an energy-analysis module, a maintenance module, and a data warehouse.

Further, the references are not necessarily combinable, as there is no disclosure in, for example, Torimitsu, for modification to include an energy-analysis module, a maintenance module, or a data warehouse. For example, why would one of skill in the art be motivated to take the teaching of MacArthur et al.—a power measurement device—and add it to the monitoring system of Torimitsu?

Accordingly, Applicants traverse the Examiner's rejection and respectfully request reconsideration and allowance of the claims.

## CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: December 22, 2003

By: 

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